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Attorney for Defendant Caliber Home Loans, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAVAD KAVIANI, as Special
Administrator the ESTATE OF KAREN
MARIE WILSON, Deceased; and JAVAD
KAVIANI, an Individual,

Plaintiffs,

v.

CALIBER HOME LOAN, a Foreign
Corporation; QUALITY LOAN SERVICE
CORPORATION, a Foreign Corporation;
DOES 1-10, unknown individuals; and
ROES 11-15, unknown entities,
Defendants.

Case No. 2:19-cv-00111-MMD-CWH

**JOINT STIPULATION FOR
EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S COMPLAINT**

SECOND REQUEST

Complaint filed: December 6, 2018

**JOINT STIPULATION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' COMPLAINT**

Pursuant to Local Civil rule 6-1(a), Defendant Caliber Home Loans, Inc. ("Caliber"), and Defendant Quality Loan Service Corporation ("Quality"), by and through their attorneys of record, (collectively, "Defendants"), and Plaintiff Javad Kaviani, individually and as Special Administrator for the Estate of Karen Marie Wilson ("Plaintiff"), *pro per*, hereby stipulate to an extension through March 27,

2019, for Defendants to respond to Plaintiff's Complaint and for Plaintiff to move for remand or otherwise respond to Caliber's Notice of Removal. In support, the Parties state as follows:

RECITALS

WHEREAS, Plaintiff filed the Complaint on December 6, 2018 (Doc. 1-1);

WHEREAS, on January 18, 2019, Caliber removed this matter to this Court, (Doc. 1);

WHEREAS, on January 28, 2019, this Court approved the Parties Stipulation to Extend Time to Respond to Complaint, setting the Defendants' response deadline and Plaintiff's deadline to move to remand for February 25, 2019;

WHEREAS, Defendants need additional time to respond to the Complaint, and accordingly, request a brief extension through March 27, 2019, in which to respond;

WHEREAS, the Parties also request this brief extension to allow time for the Parties to engage in settlement negotiations;

WHEREAS, Plaintiff consented to this brief extension via email to Defendants' counsel;

WHEREAS, Plaintiff, being pro per, needs additional time in which to file a Motion to Remand, and accordingly, requests a brief extension through March 27, 2019, in which to respond to the removal of the case;

WHEREAS, Defendants consented to this brief extension via email to Plaintiff;

WHEREAS, this stipulation is made in good faith and not for purposes of delaying the ultimate resolution of this case, and the parties will not be prejudiced by this request for extension of time.

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STIPULATION

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties hereto, that the deadline for Defendants to file their response to Plaintiff's Complaint and the deadline for Plaintiff to move to remand shall be extended up to and including March 27, 2019.

IT IS SO STIPULATED.

DATED February 25, 2019.

<p>BALLARD SPAHR LLP</p> <p><u>/s/ Joseph P. Sakai</u></p> <p>Joel E. Tasca Nevada Bar No. 14124 Joseph P. Sakai Nevada Bar No. 13578 1980 Festival Plaza Drive, Suite 900 Las Vegas, Nevada 89135</p> <p><i>Counsel for Defendant Caliber Home Loans, Inc.</i></p>	<p><u>/s/ Javad Kaviani</u></p> <p>Javad Kaviani 4525 Dean Martin Drive Unit #1909 Las Vegas, Nevada 89117</p> <p><i>Pro Per Plaintiff</i></p>
<p>MCCARTHY HOLTHUS LLP</p> <p><u>/s Kristin Schuler-Hintz</u></p> <p>Kristin A. Schuler-Hintz Nevada Bar No. 7171 9510 W. Sahara Ave., Suite 200 Las Vegas, Nevada 89117</p> <p><i>Counsel for Quality Loan Service Corporation</i></p>	

IT IS SO ORDERED.

Dated: February 26, 2019



United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the office of Ballard Spahr, LLP, and that on February 25, 2019, I electronically filed the foregoing **JOINT STIPULATION FOR EXTENSION TO RESPOND TO COMPLAINT** with the Clerk of Court for the United States District Court, District of Nevada by using the Court's CM/ECF system. Participants in this case who are registered CM/ECF users will be served by the CM/ECF system. I further certify that I have mailed the foregoing document by First-Class Mail, postage fully prepaid to the following:

Javad Kaviani
4525 Dean Martin Drive
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Kristin A. Schuler-Hintz
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Las Vegas, NV 89117

Counsel for Quality Loan Service Corporation

/s/ Mary Kay Carlton

An employee of Ballard Spahr, LLP